

**UNITED STATES DISTRICT COURT**  
for the  
Eastern District of Michigan

United States of America  
v.

Latrice Carlyne HUNTER

Case No. Case: 2:24-mj-30494  
Assigned To : Unassigned  
Assign. Date : 11/19/2024  
Description: CMP USA V. SEALED  
(DA)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 29, 2024 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section*

*Offense Description*

18 U.S.C. 922(g)(1)

Felon in possession of a firearm

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: November 19, 2024

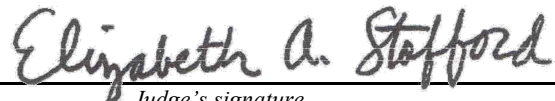
City and state: Detroit, Michigan



*Complainant's signature*

Special Agent Ryan Thick - ATF

*Printed name and title*



*Judge's signature*

Elizabeth A. Stafford, U.S. Magistrate Judge

*Printed name and title*

## **AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Ryan Thick, a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), being first duly sworn, hereby depose and state as follows:

### **Introduction and Agent Background**

1. I have been a Special Agent with ATF since November 2022. I am currently assigned to the ATF Detroit Field Office.
2. I have a bachelor's degree in criminal justice and a master's degree in business management and leadership. To become an ATF Special Agent, I underwent ATF special agent basic and criminal investigator training at the Federal Law Enforcement Training Center.
3. Throughout my law enforcement career, I have participated in numerous state and federal investigations. During my employment with the ATF, I have investigated criminal violations relating to firearms, firearms trafficking, violent crime, criminal street gangs, narcotics, and explosives. I have participated in all aspects of criminal investigations, including, but not limited to, interviews, physical surveillance, and the execution of search and arrest warrants. I have personally investigated and/or assisted other agents and officers in their investigations of federal firearm investigations.

4. I make this affidavit from personal knowledge based on my participation in this investigation, as well as communications with others who have personal knowledge of the events and circumstances described herein, and my review of reports by myself and/or other law enforcement agents, as well as information gained through my training and experience. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all details or all facts of which I am aware relating to this investigation.

### **Probable Cause**

5. The United States, including the ATF, is currently investigating Latrice Carlyne HUNTER (B/F, DOB: XX/XX/XX84), a convicted felon, for knowingly possessing a Ruger, model LC9S, 9mm caliber pistol, said firearm having previously travelled in and affected interstate commerce in violation of 18 U.S.C. § 922(g)(1) (being a felon in possession of a firearm).

6. I reviewed a criminal history check for HUNTER. This check revealed HUNTER was convicted of second-degree murder in the 13th Circuit Court, Kanawha County, Charleston, W. Va., in 2009. She served approximately seven-and-a-half years in prison.

7. Because HUNTER has been convicted of a felony offense and served more than a year in prison for this conviction, there is probable cause to believe that HUNTER is aware of her status as a convicted felon.

8. On October 29, 2024, Detroit Police Department (DPD) Officers Malick, Tillison, and Yessian conducted a traffic stop for an improperly displayed West Virginia license plate in the area of West Seven Mile Road near Grandview Street in Detroit, in the Eastern District of Michigan. Officers identified the individual sitting in the driver's seat of the vehicle, as well as his front-seat passenger, HUNTER. The driver provided Officer Tillison with documentation, whereupon officers returned to their patrol vehicle.

9. While the officers were back in their vehicle, they observed HUNTER exiting the vehicle with a black bag and running northbound on Grandview from Seven Mile. Officer Yessian pursued HUNTER on foot onto Grandview and observed HUNTER throw an object later identified as a firearm with her right hand near some bushes. Officer Yessian apprehended HUNTER within approximately 15 seconds of her fleeing the car and observed her black bag to be unzipped upon apprehending her.

10. After her apprehension, Officer Tillison retraced HUNTER'S steps and recovered a loaded firearm in the path of her flight near the same bushes.

11. HUNTER told officers that she was caught with a gun before, and the case was dismissed. HUNTER said she would get this case dismissed too.

12. I consulted with Special Agent Michael Jacobs, an interstate nexus expert with my agency. After receiving a description of the recovered firearm, Agent Jacobs determined this firearm was not manufactured in the state of Michigan and therefore previously traveled in interstate or foreign commerce.

### **CONCLUSION**

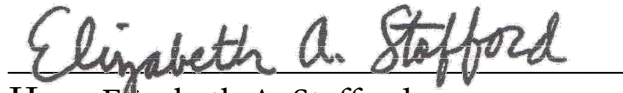
13. Probable cause exists that on October 29, 2024, in the Eastern District of Michigan, Latrice HUNTER, a convicted felon, knowingly possessed, in and affecting interstate commerce, a firearm, in violation of 18 U.S.C. § 922(g)(1).

Respectfully Submitted,



Ryan Thick, Special Agent  
Bureau of Alcohol, Tobacco,  
Firearms and Explosives

Sworn to before me and signed in my presence  
and/or by reliable electronic means.



Hon. Elizabeth A. Stafford  
United States Magistrate Judge

Dated: November 19, 2024